

Solomon Radner, Esq. (283502018)  
**LAW OFFICE OF KEITH ALTMAN**  
33228 West 12 Mile Road, Suite 375  
Farmington Hills, MI 48334  
Telephone: (248) 987-8929  
solomonradner@kaltmanlaw.com  
*Attorney for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JOSEPH D. LENTO, ESQ., an individual,  
LENTO LAW FIRM, LLC, a limited  
liability company,

Plaintiffs,

v.

KEITH ALTMAN, ESQ., an individual,  
THE LAW OFFICE OF KEITH ALTMAN,  
PLLC, a/k/a “K ALTMAN LAW”, a limited  
liability company, ARI KRESCH, an  
individual, and RICHARD GILL, an  
individual,

Defendants.

Civil Action No.: 1:22-cv-04840

Hon. Robert B. Kugler

**DEFENDANTS’ OPPOSITION TO PLAINTIFFS’ MOTION FOR AN  
EXTENSION OF TIME TO RESPOND TO DEFENDANTS’ MOTION TO  
DISMISS**

COME NOW Defendants Keith Altman (“Altman”), Law Office of Keith Altman, PLLC (“KA Law”), Richard Gill (“Gill”) and Ari Kresh (“Kresh”) with their opposition to Plaintiffs’ Motion for an Extension.

1. On November 14, 2022, Defendants filed their Motion to Dismiss with the Court. (ECF 26 and 27).

2. Plaintiffs’ response to Defendant’s motions is currently due on December 5, 2022.

3. Plaintiffs’ counsel sought concurrence from Defendants’ counsel on November 15, 2022, on an extension to reply to the motions.

4. Defendants’ counsel ultimately agreed to an extension creating the following deadlines:

a. Plaintiffs’ Response Brief Deadline: December 28, 2022

b. Defendants’ Reply Brief Deadline: January 19, 2022

**(EXHIBIT A.)**

5. Defendants’ counsel concurred in the language of Plaintiff’s motion as to the extension of deadlines only, though Plaintiffs’ counsel failed to include the agreed upon deadlines and now proposes new deadlines.

6. Plaintiffs' Motion for an Extension purports views of the parties that Defendants did not confer with Plaintiffs' on, nor would Defendants' have agreed to.

7. Plaintiffs' Motion for an Extension can is not viewed as anything but falsifying information to this honorable court.

8. Plaintiffs' moving the court in such manner is unethical.

9. Notably, Plaintiffs further mislead the Court when providing that Plaintiffs' agreed to a 60-day extension for Defendants' to respond to their Complaint.

10. This is not accurate. Rule 4 waivers were executed in an attempt to cut down on the expense of Plaintiffs' having to serve the Defendants.

11. A Rule 4 waiver allows 60-90 days to respond.

12. No extension outside of the Rule 4 waiver was granted to the Defendants by the Plaintiffs.

13. Defendants acknowledge their error in seeking additional pages over 25, as Local Rule 7.2 allows for 40 pages, making Defendants' Motion to Exceed Page Limited void.

14. Local Civil Rule 7.2 (b) provides that any brief shall... not exceed 40 ordinary pages.

15. Defendants' brief falls within the Local Rule 7.2 as the caption page, table of contents, table of authorities and certificate of service are not included in those page limits.

16. Plaintiffs' counsel is in direct violation of Red. R. Civ. P. 11 with the filing of this motion.

17. They are aware of the errors and omissions and proceeded to file the motion in bad faith.

WHEREFORE, PREMISES CONSIDERED, Defendants request this honorable Court grant the motion in part as to the deadlines already agreed upon by the parties.

Dated: November 17, 2022

Respectfully submitted,

/s/ Solomon M. Radner

Solomon M. Radner, Esq. (283502018)

LAW OFFICE OF KEITH ALTMAN

33228 West 12 Mile Road, Suite 375

Farmington Hills, MI 48334

Telephone: (248) 987-8929

[solomonradner@kaltmanlaw.com](mailto:solomonradner@kaltmanlaw.com)

*Attorney for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JOSEPH D. LENTO, ESQ., an individual,  
LENTO LAW FIRM, LLC, a limited  
liability company,

Plaintiffs,

v.

KEITH ALTMAN, ESQ., an individual,  
THE LAW OFFICE OF KEITH ALTMAN,  
PLLC, a/k/a “K ALTMAN LAW”, a limited  
liability company, ARI KRESCH, an  
individual, and RICHARD GILL, an  
individual,

Defendants.

Civil Action No.: 1:22-cv-04840

Hon. Robert B. Kugler

**CERTIFICATE OF SERVICE**

The undersigned attorney for Defendant hereby certifies that a true and correct copy of the foregoing document has been electronically filed and is available for viewing and downloading from the ECF system in accordance with the local Federal Rules of Civil Procedure.

Dated: November 17, 2022

Respectfully submitted,

/s/ Solomon M. Radner

Solomon M. Radner, Esq. (283502018)